

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22-CR-91

MONTAE D. JACOBS,
a.k.a. "MAX," "CHEDDAR," "MILLY,"

Defendant.

MOTION TO REVOKE DEFENDANT'S COMMUNICATION PRIVILEGES

The United States of America, by and through its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Erica J. Lounsberry, Assistant United States Attorney for said district, hereby respectfully moves that the Court prohibit Montae D. Jacobs from communicating with anyone except his counsel due to his sustained abuse of jailhouse communications systems to engage in criminal activity.

I. BACKGROUND

On April 28, 2022, Montae D. Jacobs was charged in a five-count indictment with one count of Use of Facilities in Interstate Commerce to Carry On a Prostitution Business in violation of 18 U.S.C. § 1952(a)(3); two counts of Sex Trafficking by Force, Fraud, or Coercion in violation of 18 U.S.C. § 1591(a)(1), (b)(1); one count of Sex Trafficking of a Child in violation of 18 U.S.C. § 1591(a)(1), (b)(2), and (c); and one count of Interference with a Sex Trafficking Investigation in violation of 18 U.S.C. § 1591(d). ECF 1. He was arraigned on these charges on May 23, 2022. ECF 5.

At the time the defendant was charged, he had been in State custody since May 11, 2021 and was serving a probation revocation sentence on Milwaukee County case number 2010CF299. The event that led to the defendant's arrest was his unlawful possession of a firearm, which he had used to intimidate the victim referred to in the indictment as AV-1.¹ AV-1 called her father for help, and her father called 911. When police responded, AV-1 disclosed that the defendant was trafficking her and other women for commercial sex, and a federal investigation was opened. The defendant's victimization of AV-1 is charged in Count Two of this case.

As part of the broader investigation, case agents began monitoring the defendant's jailhouse communications. They soon discovered that the defendant was not only attempting to make AV-1 sign and notarize a recantation letter he had written, which is the subject of Count Five in this case, but he was also trying to recruit new sex trafficking victims to earn money for him while he was in custody, including the minor victim who is the subject of Count Four in this case.

After the defendant's first attorney entered his notice of appearance, the government conveyed to defense counsel that, if it was not already apparent to the defendant from the charges mentioned above, the government was actively listening to his jail calls and reviewing his written communications as resources allowed. The government stressed that if the defendant did not want to risk facing additional charges or a motion to revoke his communication privileges, he should stop attempting to recruit women and girls to make money for him via prostitution immediately.

This message was also reiterated multiple times to the defendant's present counsel, who entered his notice of appearance on August 22, 2022 (ECF 20). The defendant's current attorney called the undersigned attorney for the government on the same day he filed his notice of appearance to ask for an overview of the case. The government conveyed that not only were two

¹ The defendant was subsequently charged in Milwaukee County case 2021CF3024 and convicted of Possession of a Firearm by a Felon on February 21, 2022.

of the defendant's five pending charges based on offending jail calls and letters, but the defendant was continuing to engage in similar patterns of communication and was at risk of being brought back to court if he did not change his behavior. Similar warnings were conveyed to counsel in person in November 2022 and in writing in December 2022. Counsel agreed to discuss this with the defendant, however the defendant's attempts to recruit new victims and to make money through criminal activity of various types have continued unabated until the present

Based on these patterns of behavior, which the defendant seemingly has no interest in voluntarily discontinuing, the government now requests that all of the defendant's communication privileges in any form with parties other than his counsel be revoked.

II. THE DEFENDANT'S HISTORY OF RECRUITING AND DIRECTING POTENTIAL TRAFFICKING VICTIMS FROM CUSTODY

As indicated above, the defendant has been abusing his call, mail, and email privileges ever since he was first taken into custody. Some of his most troubling misuses have been his attempts to recruit women and girls to earn money from him through prostitution, sugar daddies, pornography, live online sexual entertainment, and other similar avenues. Though the defendant insists in some of his communications that he is not suggesting anything illegal, it is apparent from other aspects of these same communications—combined with the evidence the government has gathered of the defendant's involvement in pimping going back to at least 2014—that these are lies intended to reassure his targets and to avoid his words later being used against him. Common themes in his communications include loyalty, submissiveness, the “power of the pussy,” his alleged network of millionaire clients and desire to recruit millionaire/billionaire clients, getting rich, and the paramount importance of never giving anything (especially sex) to anyone for free.

The defendant frequently encourages the women he speaks with to recruit other women to make money for him. In some instances, he asks them to convince women they know personally

to join his team. In others, he asks the women to cull numbers from online prostitution advertisements and funnel them to him so that he can lure them in. His pitch often resembles a pyramid scheme, wherein he attempts to convince each of the women that if they can just recruit a couple of other girls to work doing sex dates for him, they will be able to cease doing dates, sit back, and wait for the money to roll in (which he allegedly will share with them).²

Although the defendant was not charged as a result of these communications until late April 2022 or specifically warned to stop until his arraignment in May 2022, his calls, emails, and letters prior to the indictment still provide important context about the ongoing nature of the defendant's criminal scheme. Some pertinent examples beyond those relating to the charges in Counts Four and Five of the indictment follow.

A. Letters to J.C.

The defendant first began communicating with an adult female with the initials J.C. around the time of his arrest in May 2021. Law enforcement interviewed J.C. about the defendant in November 2022, and she explained that a friend of hers who was in custody with the defendant made the introduction. The defendant was aware that J.C. had previously engaged in prostitution for another trafficker, and he began asking her for favors, providing her with contact information for "tricks" or prostitution customers, asking her to recruit other women to engage in prostitution, and soliciting her help in obtaining a recantation letter from AV-1. In return, the defendant promised to set her up with a legitimate business. J.C. told agents it soon became apparent that the defendant only cared about making money. She also said she believed he had someone checking up on her, because he would confront her if she did not regularly post prostitution ads

² Meanwhile, in conversations with friends and family, the defendant candidly says he is trying to trick the women into giving him money.

and would become angry if she failed to follow his directions, such as when she declined to move in with a “sugar daddy” he referred her to because she could not bring her children.

Law enforcement reviewed fourteen letters J.C. had saved that the defendant had mailed her between October and November 2021. In them, the defendant referred to himself as “Daddy,” a term pimps commonly require the women they exploit to use when addressing them. The letters talked about J.C. making money for the defendant through prostitution. A few examples include:

- On October 10, 2021, the defendant wrote, “I rather be with a girl that do it for a fee, than out their doing a lot for free, even a f-buddy must pay some admission fee.”
- On October 18, 2021, the defendant wrote, “TBH I rather have a bitch fuck for a buck before I passed around giving nuts... I just want the \$, I’m a charmer, conversationist, and I ah fuck these girls minds not pussy; they gone chase the dog, instead of me chasing the cat.”
- On October 24, 2021, the defendant wrote, “You hoing I’m daddy...” “You being submissive and loyal to me is all NEED for US to conquer our goals.”
- On November 7, 2021, the defendant wrote, “U know you ah sell some pussy for US, hands on, I know I point you n the right direction, you gonna get that \$baby, shit aint no shame in my game, you can turn infinite dates in a day, when it’s time to lay up with me, you gone be fresh & clean, I ah tongue you down like no dicks been in your mouth.”
- On November 10, 2021, the defendant wrote, “Never blow my cover and every date you turn make sure that you use a rubber, always save more than you spend, PERIOD! Don’t never be comfortable, keep going like you trying to reach a quota to bail daddy out, like IDC how much it is, I got this pussy and it’s POWER, he getting out!”³

B. Communications with AV-1

AV-1 was arrested for violations of probation on May 11, 2021, the same date the defendant was arrested. The defendant nonetheless continued to communicate with her at various points both directly and through third parties, causing disruption to her rehabilitation; for example,

³ At the time of this letter, the defendant had not yet been convicted in Milwaukee County case 2021CF3024.

AV-1 was kicked out of a residential drug rehabilitation program in the summer of 2021 because the defendant was attempting to persuade her to recruit new victims from within the program. Later, AV-1 was taken back into the program and completed treatment. Around the time of AV-1's release from the program, in late December 2021, the defendant again began directing her to make money and send it to him. Some notable calls and messages include:

- In calls on January 1, 2022, the defendant urged AV-1 to get in touch with one of her wealthy regular clients. He told her, "At least you got a millionaire in your pocket. You gotta know how to squeeze his ass." They argued about money, and the defendant told AV-1 that he needed her to "hold it down for us." During the conversation, he used one of his go-to arguments: that woman came from man and was placed on earth to help man. He instructed her to "turn it up" on the webcam and admonished her, "Four hours of sleep. That's it, all right?"
- On January 2, 2022, the defendant called AV-1 a "retarded ass bitch" for not picking up his calls the night before. He advised her in coded language to avoid contracting a sexually transmitted disease by focusing on webcam work but reminded her that if she has sex with anyone, "it's for a fee, not for free." Over the course of several calls, the defendant talked to AV-1 about getting rich, other women working for him, and his interest in recruiting her former cellmate to work for him. AV-1 did not want to bring the cellmate into their relationship, but the defendant told her, "Hos stick together." When AV-1 protested that she is not a "ho," the defendant lectured her, repeatedly called her a bitch, a ho, and a prostitute. AV-1 insisted that she was not going back into that lifestyle, to which the defendant replied, "I hope your ass doesn't get hit for free." AV-1 asked the defendant to stop disrespecting her, and the defendant responded, "Or what?"
- On January 3, 2022, the defendant reminded AV-1 in a letter, "ANYTHING YOU do must be for a FEE and NEVER FREE."
- On January 4, 2022, the defendant tried to persuade AV-1 not to worry about her probation requirements and to put her energy into milking money out of a regular client named Frank. He told her, "[L]ike dam bae you gotta be about your \$\$\$ man. None would've never new [sic] about that, fr! Like man I gotta stand on you because you seem mentally unsteady or better yet, your mind just on getting a job and going to group, your P.O. can't make you go to group if your work hours trump group hours, especially you got your own business and side hustles going on."
- On January 6, 2022, the defendant continued to manipulate AV-1 emotionally in several emails. He called her "Mrs. Jacobs" and told her to "hold that shit down" like a "real bitch." He admonished her, "[R]emember to dictate the trick, don't let him dictate you, you control the ship, he just riding, you the prize he just another

contestant that's desperate, Nbs!" He instructed her to take advantage of one of her regulars by claiming that she has changed, that she is now celibate, and that she wants to marry him and start some businesses, but she needs money from him first.

- On January 14, 2022, the defendant emailed AV-1 the text of three different online ads for prostitution and on-demand pornography, including prices for various services, and directed her to post them with Milwaukee as the city.

C. Communications with A.A.

Sometime in or around early 2022, the defendant began communicating with an adult female with the initials A.A.⁴ The emails law enforcement reviewed began on March 7, 2022 with a message in which the defendant appeared irritated that A.A. was not answering his calls.

He claimed he had money to send her but said he would not do so until she started picking up.

Several of his subsequent communications concerned pimping:

- On March 8, 2022, he sought to create a distinction between "hos" (the other women he had profited from in the past) and "pros" (a category he placed her in that, while apparently being superior to being a "ho," still involved earning money from sex acts). He wrote, "You deserve a real nigga, before I ah play you, I a p on some hoes, get \$racks, and be like bae, let's do this with this \$, Real Shit.⁵ A girl that's solid gonna stand tall through it all, hoes don't stay down, they get around, that's why I done blew through so many, I lost count! They like tents, they got a weak foundation, any little friction, they bound to collapse, #codependent. A pro is independent with a foundation strong enough to build a skyscraper on."
- On March 9, 2022, he attempted to lure A.A. in by convincing her that he was already wealthy and did not need her, but that if she would help him in the short term, it would benefit her in the long term: "I sense a go getta, let me remind you I don't need you to provide me in no way, especially with prison contributions, I just need a woman who can do things that addup/make sense for longevity and beneficial to US. Things that I can't do or struggling with others to get done for me... I'm very mindful and rewarding. I ah get out and go west with the best and knock a rich white cougar, and breaks millions—hundreds of thousands with you... #weinvest."

⁴ Because case agents have not received or reviewed all of the defendant's communications, it is difficult to determine the first time he when he communicated with each new female. With respect to A.A., it appears that a different female gave the defendant (or possibly another inmate) A.A.'s contact information.

⁵ "P" is common shorthand for "pimp;" though often used as a noun, the defendant is using it here as a verb.

D. Communications with H.T.

Around the same time the defendant was talking to A.A., he also began trying to recruit H.T.

His emails to her were similar to his communications with other women as discussed above:

- On March 11, 2022, the defendant wrote, “Everything you do you should get paid for baby, not for free but for a fee... So look baby I’m finna put you on some game #newsyoucanuse Go to megapersonals.com and skipthegames.com, sign, up, you have be i.d. ready in order to secure an account and make ad’s... Anyways these sites are used to sell content and do dates (you know what I mean baby) I’m about to send you an entire ad layout for your content like pics and videos... Remember when I call if you around a trick/dude play as if I’m your gay bestfriend... I’ve done with many girls and made thousands online... I’ve never worried about no fucking, I just hope it’s for a fee and not free. Protect yourself and don’t get pregnant on me. I’ll be out soon...”
- On March 12, 2022, the defendant wrote, “Look baby it’s some old white men on the unit with me who got \$, some have cashapp, some can send \$ off their books to you. They thirsty and will pay for conversation and some entertainment. We can game them like you my girl, friend! Nbs I do have access to account for skipthegames, so you don’t have to wait such a long time to get approved, you will be able to get in motion ASAP.”

E. Communications with J.P. and B.P.

Also in March 2022, the defendant began trying to recruit a woman with the initials J.P.

He pushed her to sell pornographic images and videos of herself on sites like skipthegames.com, megapersonals.com, and onlyfans.com, distinguishing between “hos” and “pros.” He tried to convince J.P. to recruit some “hos” they could make money off of and that they needed her younger sister, B.P., to start making money so they could reach their goals more quickly. The defendant also solicited B.P. directly. Some of the defendant’s emails to the sisters included the following:

- On March 22, 2022, the defendant wrote to J.P. about recruiting other women to make money for them from prostitution: “Well tbh I’ve always kept hoes on deck, you know what I mean... You different you not a hoe... Baby where the hoes at? Lmaooo...lbvs! We all can make \$ nbs, I ah just have the \$ hit your cashapp, and you can pay the ho’! Really she don’t even have to be a hoe, she can be a white girl that makes sense.”⁶

⁶ The defendant uses the phrase “makes sense” throughout his communications to mean “exchanges sex for money,” based on his belief that having sex for free makes no sense. He frequently exhorts the women with whom he communicates, “Make it make sense!” when he believes they are having sex without being paid for it.

- On April 2, 2022, the defendant wrote to J.P. about getting B.P. involved in manipulating a fellow inmate for money over the phone. In his letter, the defendant asserted that J.P. belonged to him because of the “game” he had been giving her, a term pimps use to describe their insights and instructions about the prostitution business. He reminded her not to let anyone outside of the “game” (“a lame”) have sex with her for free anymore: “Aye baby you mines for the taking but dig this [B.P.] can help us all make some \$ rn...easy...just conversation with this old man who locked up not fucked...he gotta pay for the number...then she follow the directives from me on how to get racks out of him..no cap!” “Anyways be easy out there and keep your game tight! All the game I been giving you, you should never let a lame hit no more... you belonging to A #BO\$\$. I got the right directions for you to make monetary connections...”
- On April 3, 2022, the defendant gave B.P. instructions about making money from sexual phone calls with inmates. He told her she should have enough money by now to be sending him things and bragged to her about the kind of money he claimed he was accustomed to: “Baby you gonna have talk freaky to them, they perverted but gonna trick that \$! I also told sis about how to crack g’s off that site by selling other girls content...#\$easymoney. Like dam ma you ah be racked up by now ma... saying ish to me like what you want me to send or buy you daddyyyy?” “It’s a movement few people you wanna move with... I like designer on my feet, bankrolls that don’t fold, coasting and exotic whips!”
- On April 5, 2022, the defendant wrote to J.P. about getting money from his “millionaire buddy,” a regular client named Jim. He listed Jim’s likes as himself (the defendant), cocaine, marijuana, and girls. He gave J.P. Jim’s number and told her to text him saying that she is the defendant’s “wife,” that she hears he likes girls, and that they have some for him. “[I]f you got some hoes on deck get some pics of them and send them to to him...Nbss. He ah have to cash, Period!” He also told her that an inmate gave him \$20 worth of food in exchange for J.P.’s number.
- On April 6, 2022, the defendant wrote to J.P. about recruiting “hos” from Facebook and escorting websites: “Look baby I’m can get us some \$ but you gotta be a team player...how u wanna do this? We can inbox some hoes off of facebook that’s #montaecrazy. Better yet you can go on skipthegames.com and search female escorts under these cities Minneapolis, Minnesota; Chicago,Illinois; Houston,Texas; San Diego, California and Seattle, Washington. Now look nbs get me a total of 10 numbers two from each city, please pick some decent looking girls. I’m going to call them and they up my alley, so they gonna peep my flavor, wanna scoop & taste it..Period #conversationrulesthenation.” In subsequent emails that day, the defendant appeared to be frustrated that J.P. was not making money. He wrote, “It’s a major move, you gotta get right or get left. Fuck them crumb bums you been waisting [sic] time with, and know that whatever you do, it has to be for a fee and never free!” He advised her to stop worrying that someone would recognize her and act like a “pro” by get “freaky” on “webcam platforms.”

- On April 29, 2022 during a phone call, J.P. told the defendant that she was not like his “hos” and was not going to “sell pussy.” She asked the defendant what was going on with “these hos” and whether he was using them. The defendant replied, “Hell yeah!” The defendant told J.P. he was also looking for wealthy cougars.

III. POST-INDICTMENT COMMUNICATIONS OF CONCERN

Sometime around May 6, 2022, the defendant learned he had been indicted in this case.⁷

This added a new dynamic to many of his calls, letters, and emails wherein he attempted to persuade various women to inform on “hos” and “drug dealers” on his behalf, in order to earn him substantial assistance credit toward the dismissal of this case. In exchange, he promised the women substantial sums of money, housing, bodyguards, and other benefits that would allegedly come from the federal government.⁸ His core goal of recruiting females to engage in commercial sex acts and related sexual enterprises in order to make money for him, however, endured. The defendant continued trying to entice many of the same women he had been speaking to before the indictment, as well as other women as he solicited and received new contact information.

A number of examples of the continuation of this pattern are outlined in the sections below. Importantly, the communications discussed below are solely the result of case agents spot-checking the defendant’s recorded calls, emails, and letters as they have opportunity. The government’s agents have not had time to review every one of the myriad communications the defendant has made or received during the last approximately one year that he has been under indictment. The representative sample they have reviewed, however, demonstrates that he continues to use his communication privileges to attempt to engage in further criminal activity. And the resource problem of staying on top of all of his communications in a timely manner

⁷ This is the date of the first jail call case agents found wherein the defendant told someone about the indictment.

⁸ The government notes that it has never offered the defendant or anyone associated with him anything or expressed any interest in cooperation from him or any third party recruited by him.

demonstrates why the only feasible solution at this juncture is to suspend those communication privileges.

A. Communications with J.P.

From the time he learned of the indictment in May 2022 through at least March 15, 2023 (the most recent date for which the government currently has records of the defendant's jail communications), the defendant has continued to urge J.P. to make money for him. Some communications of note include the following:

- On May 7, 2022, the defendant had several calls with J.P. He opined that she is too tired all the time and said that when he gets out, he is going to give her Adderall to wake her up.⁹ He asked her again about making pornographic videos to sell online, however she told him she did not want to.
- On June 15, 2022, the defendant appeared frustrated that he was having difficulty using social media to recruit. He wrote, "All I know is many hoes have heard of me, so many would and still will rotate with me. Shit be hard when [my sister] don't want to share any of my pictures and the Feds shut down my social, so it's complicated yet not impossible to entice and knock a bi\$ch!¹⁰ Conversation rules that nation 24/7=365!" He continued to ask J.P. to recruit more girls for him from escorting websites. He gave her the exact text of a message to send recruits that claimed many of his money-making opportunities would not involve any physical contact (implying that others would): "Baby go on skipthegames go Madison, Milwaukee, Sheboygan, Cedar Rapids, Iowa, Las Vegas, Nevada & San Diego, California! Look for the girls who look younger older type look! Snow bunnies ma!¹¹ Record all the numbers you get and put them in a group text! Copy/paste the message below...Hey girl?! \$\$\$ Let's get some \$\$\$! I'm in the FEDS rn around riches in&out, the show don't stop because I'm locked! I got a rich menu with a variety of money moves(fast), you choose? Just know that a lot of moves is off the phone(nocontact) & sweet! Like I'm around old white millionaires (con-men) (they on my line)who lonely and desperate for companionship... I see thousands get sent via cashapp off a few requests(light words)I just need a girl of your speed(what I'm use to)(just be smart and fair), be true to the game and it will be true to u, what u wanna do? Lmk and the truth will show. If ain't bout no \$ it

⁹ Drug-related themes come up in many of the defendant's communications. For instance, on May 9, 2022, J.P. told the defendant about a car accident she had been in some time earlier in which she had hurt her back. The defendant advised her to get a pain pill prescription and to sell the pills for thousands of dollars. The evidence gathered in this case has revealed that the defendant used drugs to recruit and maintain several of his sex trafficking victims.

¹⁰ The phrase "knock a bitch" in the pimping lifestyle means to recruit a new female to earn money for the pimp through prostitution.

¹¹ "Snow bunny" is a term used to refer to a white female who exchanges sex for money.

ain't bout nothing! Maximize your craft with me and win big! #refusetolose #play2win #citygirl #newsucanuse! Please skipthegames and run up a check with no regrets! Ty and God Bless You! By the way I'm Milli! The reward is great nothing is illegal..Nbsss.”

- On July 18, 2022, the defendant continued to push the reluctant J.P. to make money. He sent her a list of the “top 10 generous cities in the U.S.A. per Google” and told her that she should be selling videos of herself to people in these cities online, for example, 50 at \$20 each to earn \$1,000. He wrote, “[U] need to get in tune with your sexuality and learn how to finesse all men with your sexuality and brains! Get in tune, baby, I’m a P and can’t help myself, let me coach u baby. I’m daddy, also that for free ish’ really out of pocket, he should be giving u something of value than hard dick!”¹² “Come on now all the hustler girls know that the \$ online. U got what it takes & U know if I were in your presence u would be doing all this in more voluntarily.” He then gave her step-by-step instructions for posting an ad on skipthegames.com.
- On August 2, 2022, the defendant sent J.P. a letter wherein he continually referred to himself as “daddy” and wrote, “I don’t see you losing especially by you listening to my directives, I’m really intelligent, I been did my homework, I been supposed to transitioned to corporate riches, instead I got side tracked pimping ho’ bitches. I want to share my blueprint directives with you and show you how can amass riches and wealthy connects within a short period of time, you just can’t be scared baby.” He laid out what he wanted her skipthegames.com ad to say, along with a list of the “top 10 generous cities” where he wanted her to post it and claimed that the last time he had a girl run such an ad, she met three millionaires and many others who wanted to invest in a “dominatrix/webcam business.” He encouraged her that this was “mastermind thinking” and “guerilla marketing” and reassured her, “This don’t make u no hoe, it makes you a hustler, an innovator!”
- On February 10, 2023, the defendant called J.P. He asked her where she had been and when she was going to send him some of “the trick’s money.” He asked her to confirm she had been “busting moves,” and she said she had. The defendant told J.P. he would hook her up with his people, but she needed to give him a cut. They discussed specific individuals, and the defendant told J.P. that she needed to “play” these men using her “big ass booty.” He reminded her not to do anything for free.
- On February 26, 2023, the defendant called J.P. He asked her to call him “daddy,” but she refused. He told her to send him money and photos of her “big booty ass.” He also said he wanted her to pick him up from prison wearing a trench coat with nothing underneath. J.P. again refused, prompting the defendant to ask, “Who’s in charge?” The defendant told J.P. that she should not view him as a sucker and that she needed to stay focused.

¹² “Out of pocket” is a phrase used by pimps to describe when a victim is violating the pimp’s rules or the universal rules of “the game.”

B. Communications with A.D.

The defendant appears to have begun communicating with A.D. in approximately early April 2022, and the communications continued into May 2022, after the defendant had learned he was under indictment. The messages were similar in nature to many that have already been discussed with other women and indicative that he was trying to recruit her to make money for him through commercial sex-related avenues. On May 17, 2022, he sent her an email in which he appeared to increase the pressure on A.D. to make money by breaking her down and making her feel lucky to be talking to him—a common technique in sex trafficking. He wrote,

It's not my fault that you are a emotional wreck and don't know how to tame yourself... You NEED to look at yourself and see that your are the problem. It starts with you! Girl don't nobody need you, it's more of a want thing! I know I'm ah BO\$\$, I would never need anything/want ish' from you in society! What I know is cash me or pass me. Any female knows if she talking to a dude locked up that she must provide(vice-versa), or what's the purpose?... Man get real and beat it with all the games, lies, apologies, excuses, etc. Bitch just say yes or no! Period! That little \$ you got is what you use to, expand your mind and elevate your grind=Big \$! Scared \$ don't make no \$! You talking about listening to others, you so ignorant, I been put you on game to get bands in several ways(make your check in a couple of days)... You a good bitch to have, but shit for a nigga like me, you gotta come with it, ten toes down, like I got you daddyyyy... [G]et right or get left. Working a 9to5 until you get old not where it's at!

C. Communications with S.B.

During the month of July 2022, the defendant communicated heavily with a woman with the initials S.B. As with the other women, he began with encouragement, urging her that she would become rich quickly if she would follow his instructions. Later, when she did not follow through as he wanted her to, his communications became more nagging and frustrated.

- On July 4, 2022, the defendant wrote S.B. several emails talking to her about recruiting other girls, making ads online, and talking to “millionaires” in his pod in exchange for money. He wrote, “So let me cut to the chase, I need you to get a snow bunny! I’m going to send you the cities and states to pitch this text message to them. Basically all you are doing is going on the site u on, recording numbers on paper and placing them in a group text with the message(copy/paste) you’ll

receive from me shortly. All we need is one!” “Like let me put you on game, some guys are getting deported and looking to pay for spousal visa in order to return to the U.S.(One out of many moves.) I got like 3 certified millionaires I network with on the pod rn! Remember your network is your networth!” “You need some weight lifted off your shoulders, tbh a snowgirl would compliment you well in multiple ways, idk who she is, but I can show u how to get her! It’s way bigger than pushing P, do you really know the power of it?”¹³

- On July 10, 2022, the defendant sent S.B. several emails. He wrote, “I’m not no rookie and everything that I got came from pussy! I just deal with woman in various ways and I’m always going to enlighten a girl and expand her horizon on how to elevate her game! Turn a rock into a mountain!... I’m a pure player, meaning I’m able to adapt and play on any circumstance presented to me... I’m not meant for one girl like I’m meant for many(family) and we all eat and prosper!” The defendant then sent her a list of cities to post ads in based on his research concerning the number of billionaires living there, as well as the text of an ad for selling pornographic images and videos. He promised to make S.B. a “boss bitch” by the time she was 30 years old and that she would own businesses and real estate.
- On July 11, 2022, the defendant sent S.B. several more emails, urging her to seize all opportunities to make money. He told her, “The guy I gave you 67, chill, cool and like to party! You can’t be complacent, never satisfied is the motto, that’s the mentality that’s going to unlock your untapped potentials. So tap in with him ASAP.” “I’m just locked up not fucked up! I still got money, power, respect with cross country connections!” “We not in this field of work for long, so always maximize every opportunity with the appropriate trick baby!” He used several common pimping terms and sayings, such as, “I want you to treat me like the King I am in due time, I will do the same. I need you down for my crown, standing 10 toes down.” He also urged her to continue trying to recruit a white female from an escorting website to work with: “Think about that bunny whoever she is, she ah come in handy! Also maximize on the dating sites and state bisexual.”
- On July 13, 2022, the defendant continued emailing S.B. on the same themes. He told her, “I just want you to submit to me like OK Daddy, u will see transformations of SUCCESS... I’m use to my girl catering me, I’m use to her turning nothing into something, I’m use to the refuse2lose attitude!” He repeatedly reiterated that bringing another girl on board would help with their money-making goals, for example: “I just feel that it’s somebody that u can work with out there, a girl who in&out hotels, u can get a cut from every move she makes, she would have a place to feel secure at with you, & y’all can network with each other.” He lamented needing to “stand on” her and her excuses for not taking care of business. He also suggested that she should express her fidelity monetarily: “I’m not in your pocket, the only thing you can do for me expense wise is send me some \$ or order a icare, which is easy when u pushing P & staying loyal!” He also discussed other money-

¹³ In the phrase “pushing P,” the defendant is using “P” as shorthand for “pussy” rather than “pimp.”

making scams, including some type of filing with the IRS from which he expected to receive \$30,000 that he was frustrated she had not yet taken advantage of, and a friend who sells high quality counterfeit check stubs.

- On July 14, 2022, the defendant turned up the pressure on S.B.: “U no what, this shit not going no where, one thing I can’t accept is a fuck nigga and a lying ass bitch! All these tests I’m giving u, u failing! I’m good! Then it’s a major red flag when a stranger tell u to file for 30k legitimately, u still omissive to do so, 6 days now! #noexcuses #noapologies.” “A bitch that fuck with me stand on her word & get shit done in a timely manner, a bitch that’s with me always for a fee & never free! A bitch that’s with me pushing P until funds is sufficient to make investments. Stop playing games and save that for lames. I ah send yo ass out to Las Vegas, what u gone do? Miami? Los Angeles? Manhattan? Stop playing with me, aye check this out bitch get yo mind right, fr! Love always, Daddy.”
- On July 18, 2022, the defendant told S.B. he needed her to get a good amount of money out of one of her regulars and suggested she work with H.T., one of the women he was attempting to recruit in March 2022, prior to the indictment. He also instructed her to send him contact information for white women posting ads on skipthegames.com in Canada, the United Kingdom, and Denmark, as well as to help him get in touch with “a rich white cougar.”
- On July 26, 2022, the defendant again pushed S.B. to make money from his regulars and selling sex, even though it appears she had previously deflected him: “Did u hear from Jim or Frank?(Millionaires) What’s new on your end?” “Pushing P baby, all that ass on u, it’s no way u shouldn’t be sitting on band\$! All I ever wanted to do is be some motivation and sense to u! Shit u had more excuses than a fat bitch supposedly going on a diet, LOL!”

D. Communications with J.C.

By at least September 2022, the defendant had resumed communicating with J.C., the woman who had reported being recruited by the defendant to law enforcement in December 2022. He urged her to cooperate with “the Feds,” including suggesting she inform on J.P. and B.P., and promised her “the world,” whatever she wanted, “millions in a mansion,” and plenty of other benefits if she would get him out of custody. He also suggested that J.C. could blackmail an unknown individual by threatening to report him for tax evasion, sexual harassment, or assault. He also quickly returned to trying to guilt and pressure her to make money for him through pornography, prostitution, and other related ventures:

- On October 30, 2022, the defendant wrote J.C. a letter stating that it was time for her to make some adjustments and sacrifices. In addition to his idea that she become a paid informant who could get credit against his sentence, he sent her a list of cities in which to post ads on megapersonals.com, along with a fee structure for “pics,” “quick video,” “sexting 5 min,” and “live video fuck.” He told her not to overcomplicate things and to just get money. He also suggested that she circumvent the prison’s visitation rules by having someone else register for video visits, and then appearing with or in lieu of that person. He closed by presenting her with an opportunity to extort money from an unknown female inmate’s wealthy parents by claiming she had evidence that could clear their daughter.
- Over time, the defendant increased the pressure on J.C. to make more money for him. On November 21, 2022, he wrote, “Baby I need you to fuck the UNIVERSE, like stop slacking... I’m accustom to a girl being down for me and her, providing for US, listening to me, believing in me, being comfortable with me, and having NO PROBLEM with her giving her completely to me (mentally, spiritually, emotionally, physically) and breaking break [sic], you know make sure a real one STR8. For it’s nothing you want [sic] do for US, SUBMIT BAE!” He then told her bluntly what he wanted: “On some real shit bae, it’s time to start FULL-TIME selling pussy. Make a quota, set a schedule, pick a location, and execute.” He told her that most profitable place to do this was in Texas. He also reminded her that whenever she made money, she needed to share it with him and demanded complete control over her: “When you come UP break bread with DADDYY. We stuck with each other, too much been inverted [sic], I don’t believe in QUILTS, hell naw, you belong to me, I stimulate your mind, give you vision, motivate your hustle, irritate your soul, and enlighten you on goals, FACTS. You know you fuck with me, as you reading this RN, tell yourself I’m giving all of me to him, PERIOD. You know that the reward is greater than the risk, and the pros outweigh the cons.” The defendant signed the letter “Daddyy 100.”
- On February 3, 2023, the defendant called J.C. and told her he was disappointed in her for not having a good “sponsor.” J.C. replied that she did not do “any of that” anymore because she did not have transportation. The defendant then said that J.C. should be making money online.
- On February 28, 2023, the defendant again called J.C. He told her she was making him angry by blocking him. He said he had a book of old men in his cell from whom she could make money. He accused her of being “out of pocket” and asked why she was not on Chaturbate, a pornographic chat site known for live, interactive sexual webcam performances that viewers pay to access and direct.

E. Communications with K.T.

More recently, the defendant has been communicating with a female who was using what appears to perhaps be an alias with the initials of K.T. As with all of the other women discussed

herein, the defendant's messages and calls to her center around making money, submitting to him, and not doing anything for free. The majority of identified communications between them occurred in February 2023:

- On February 2, 2023, the defendant called K.T. multiple times. She indicated she was not in a good mood because she was tired from “trying too hard.” The defendant responded that having more than one hustle and making more money would make things better. He advised her to “jump on the webcam and get that easy paper.” He remarked that he could not understand why she was not online when all she needed to do was post an ad, and men would contact her to give her money. He said he knew this because he was “the man behind the scenes,” and he reminisced about a rich man who used to pay to see the defendant have sex with women. The defendant instructed K.T. to set up a Facebook page for him to attract “cougars” and asked her to rate her “sex game.” He told K.T. that he did not want to be labeled a pimp and that he preferred to be seen as a “coach” or a “motivational influencer” who could help women to “maximize their craft.”
- On February 8, 2023, the defendant called K.T. again. He scolded her for being “out of pocket” because she was willing to have sex for free but not for a fee. He admonished her to “make it make sense.” He also told her to stop resisting, and “Don’t hesitate; participate!” He pontificated about the size of his penis and the “power of the pussy” to rule the world. He also told her he would move her into one of his “cribs” but that she first needed to work with him. He chastised her for not yet having posted any escort ads, asking her, “What the fuck is wrong with you?” K.T. told the defendant she was getting things together, but the defendant challenged her that she had been claiming she was working on it for two weeks. The defendant insisted that K.T. call him “daddy” and concluded their call, “Make an ad. Make that money.”
- On February 26, 2023, the defendant again called K.T. multiple times. K.T. appeared upset and complained to the defendant that her number had been passed all over the prison and many inmates were calling her. The defendant sidestepped the implication that he had shared her information and replied that he was not like these other men. He told K.T. to write him a letter calling him “daddy” and warned her that no one should be having sex with her for free. He told her that he “own[s] that pussy.” He reiterated that she needed to get a “bank roll,” that men should be paying her, and that she should be giving him (the defendant) “something other than hard dick.” He told her that when he got out of custody, he would turn her upside down. In the meantime, he asked her to post an ad using his photo to see if he could get any “cougars” to respond.

F. Communications with K.V.

As of March 2023, the defendant has been communicating about similar topics as those discussed above with a female with the initials K.V.:

- On March 7, 2023, the defendant boasted to K.V. about the value of the “game” he was giving her and warned her not to be fake with him, lest karma take its toll. He told her, “Remember this besides CHRIST my religion is ‘FREE IS NEVER.’ Whatever you do in life you should get paid for it. So remember it’s a FEE & never FREE!” He asked her to make an account on skipthegames.com and said he would send her an ad layout so that she could sell pornographic images and videos of herself using a 415-area code. He told her he would show her numerous ways to “knock sponsors,” start businesses, and make money creatively, such as with a sham green card marriage. He concluded his email, “Remember if it ain’t about no \$, its not about shit, Period.”
- On March 10, 2023, the defendant emailed K.V. multiple times calling himself “daddy” and talking about how much money she could make. He encouraged her to dream about her ideal home, her ideal car, cosmetic surgery, national travel, and “the finer things in life.” He told her to stop wasting time and start making money online. He wrote, “GET \$ BABY...POINT BLANK PERIOD....bullshit not about nothing! First & foremost be smart & safe! Let it make \$EN\$E Get \$, Save \$, Spend \$, Invest \$! #elevate #levelup #gogetit #transform #money power respect #broke not pretty. I gave you easy money moves and linked you with a cool ass millionaire. I'm real about mines, let's work baby! Let mama have daddyy!”
- On March 11, 2023, the defendant again emailed K.V. and reminded her of his rule that everything she did should be paid: “It’s all about the Benjamin’s, orgasms not going to pay the bills. The rule is pay to play! Admission shall be a fee, never free! I’m into taking trips & spending chips! I’m into seeing people and going places.” He then enlightened her on his philosophy about “hos” versus “bitches” (similar to his beliefs on “hos” and “pros”): “Hoes for free, hoes stay po’ & bitches get riches! #broke today/rich tonight. 24hrs in a day, bullshit not about nothing! Network and make \$!”
- On March 12, 2023, the defendant showed signs of growing impatient with K.V., as he eventually did with each of the other women discussed above: “I taught u how to make money without no \$...all off u & internet connections! I also linked u with a millionaire pal of mines, I still have two more besides him! Aye I look at u like what can u do for us! I'm use to a girl going to get \$ and breaking bread with her daddyyy! I'm use to instructing/coaching my girl on how to obtain prosperity in raid ways, u know multiple ways to milk a cow. Show me that u can handle the small though significant tasks, so that we can level up and accomplished bigger objectives. Stay focused baby, enough of the b.s. Partying is old, it's business before pleasure, all that for free shit is dead!!!! Get your \$, a lot it is waiting on u!”

- On March 13, 2023, the defendant reprised his themes of K.V. making money for everything she does and following instructions. He told her having sex for free was “disgusting” and stressed, “Get \$ baby! Stop over thinking things, what I'm telling u makes sense! Rather it be non-contact(content sales) or hands on meetings, get your \$! You already like to be sexually active, why not cash in? It's a no brained, duh! Make daddy happy and get that \$! Start networking, building connections and running up that \$! Every day u should get \$...” He urged her to find a sugar daddy and boasted that he himself had a cougar in San Francisco who bankrolled him.
- On March 14, 2023, the defendant emailed K.V. various money-making ideas, including that K.V. should Google “adult jobs” to see how she could become a “sex hotline operator” and that his millionaire buddy was waiting to hear from her. After several emails without any response from K.V., the defendant became frustrated, telling her, “I really not about to waste my time. This your lost not mines! My hand not even slightly revealed, from the people I know to the places I go! Stashes out South to the West, with the best, I can't elevate u when failing small tests!” He then deployed one of his favorite wordplay lines, telling her to get right or get left.

G. Communications Through Third Parties

In addition to contacting women directly, the defendant has used acquaintances and family members to call and text women on his behalf. In fact, case agents have indicated that in the majority of the calls they have reviewed, the defendant asks the individual he calls to contact someone else for him, such as via text, or to connect another person via three-way calling. In many instances, he has used these third parties, many of whom are his family members, to contact women who have blocked him from calling or emailing them, or to reach out to people with whom he is not supposed to have contact.

For example, shortly after the defendant learned of the federal indictment, the defendant had several calls with an older female who appears to be a family member who resides in Texas. As they discussed the indictment, they attempted to determine whether AV-1 was cooperating with law enforcement. The older woman indicated she would contact AV-1 to find out. The defendant instructed her to be careful not to frighten AV-1 but to “reel her in.” In another call, the same woman indicated she would persuade AV-1 not to testify so that “the feds” would offer the

defendant a more favorable plea. In yet another call, this woman advised him not to contact AV-1 directly but to have his cousin reach out on his behalf.

In the weeks following the indictment, the defendant also talked to his mother about wanting a recantation affidavit from AV-1. He also spoke to his mother about his plans to have women involved in prostitution cooperate with law enforcement in exchange for the charges against him being dropped. On June 5, 2023, he told his mother in a letter, “On some real shit I need to talk to some hoes that I can charm and get them to help me. Rather they need to be incentivized, etc. I just need to know that they down for whatever!” As for how he would accomplish this, he wrote, “I do have the gift of gab. I know that conversation rules the nation. I know a lot of hoes like to be sold dreams.”

The defendant has also asked two different men he refers to as his uncles to send texts to females on multiple occasions since he has been in custody.¹⁴ Most recently, on February 25, 2023, the defendant asked one of his uncles to text a woman saying, “M-way said what is your email address and he will get you pictures soon. He tried calling you from a 715- area code. Remember, that’s white boy Ed guy. He is very beneficial,” which is the defendant’s word for someone affluent. His uncle expressed concern about having his phone number tied to this text and told the defendant he “blew it” the last time with those types of messages. He told the defendant he was not going to be “texting random hos.” Ultimately, they compromised that his uncle would text the woman, “M-way said answer when he calls,” but he warned the defendant, “You can’t get involved in anything with no bitches.”

¹⁴ Multiple victims have told case agents that at least one of the defendant’s uncles was assisting the defendant in trafficking women for commercial sex prior to his indictment.

IV. REQUEST TO TERMINATE THE DEFENDANT'S COMMUNICATION PRIVILEGES

All of the aforementioned calls, emails, and letters—both before and after the defendant was indicted and put on notice about the consequences of continuing this course of conduct—make clear that the defendant is either unwilling or unable to cease the type of behavior that resulted in him becoming a federal defendant in the first place. At a minimum, the defendant is continuing to engage in the crime charged in Count One of the indictment, the use of facilities in interstate commerce (emails, phone calls, and the U.S. mail) to carry on a prostitution business in violation of Title 18, United States Code, Section 1952(a)(3). Arguably, however, these communications are also overtures toward (if not the completed crime of) sex trafficking of these women by force, fraud, or coercion.

Although the defendant is in custody and unable to use direct physical force against the women he is seeking to entice and recruit to engage in prostitution, he has made ample use of other techniques commonly employed by traffickers, such as false promises of affection, wealth, or that this avenue of earning money will only be temporary; deceiving the women about the legality or consequences of the things he asks them to do; relentlessly hounding the women multiple times a day (as much as his calling and email limits will allow), including having other people reach out to them if they fail to respond immediately; playing against the women's self-esteem and insecurities; keeping the women off-balance by rapidly alternating between motivational talk/praise and anger; trying to convince each woman that she is uniquely special to him while all of the other women he is dealing with are expendable; and shaming of the women if they fail to meet his expectations or follow his rules. Perhaps even more troubling, the defendant will not take no for an answer. Time and again, he continues to harass women so even when they block him, tell him they do not want to do what he is asking, or tell him they are trying to change.

As noted above, the government has had multiple conversations with defense counsel about this problem, and counsel has agreed to convey the seriousness of the defendant's ongoing criminal behavior to him. Aside from causing the defendant to complain to his mother about undersigned counsel, it appears these conversations have utterly failed to impact the defendant's behavior.

Due to the defendant constantly finding new women to solicit, it is not possible to limit his behavior by imposing a traditional no-contact order. Indeed, a no-contact order already exists in this case (ECF 11-14), however the defendant's behavior of concern is constantly evolving. Nor would it be feasible to allow the defendant to have contact with particular exempted individuals. Whatever the defendant's actual rate of success at persuading others to act on his behalf, it is clear he continues to view using others as a viable alternative to speaking with those who do not wish to speak to him, such as those who have blocked his direct communication attempts. And his uncanny degree of persistence in these efforts suggests he will not soon stop.

Finally, as noted above, it takes considerable government resources to keep up with all of the defendant's communications, a very large percentage of which appear to be criminal in nature, or at least grooming for future criminal activity. It cannot possibly identify and stop each new potential trafficking situation in a timely manner. While the Court can revisit the requested restrictions at a later date if warranted, the defendant's actions have gone far enough, and the Court's intervention is needed at present to stem the tide of his recruitment efforts.

V. CONCLUSION

The defendant has been misusing his communication privileges for nearly two years, resulting in numerous women and girls, as well as the administration of justice, being put at risk. He has also refused to heed the government's warnings to discontinue this course of conduct. The

government therefore respectfully requests that the Court grant this motion and prohibit the defendant from communicating by any means with anyone except his counsel.

Dated at Milwaukee, Wisconsin this 22nd day of March, 2023.

Respectfully submitted,

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